

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates:

PLAINTIFF(S)

18-cv-00348 (Dorothy Smith v. 3M Co., et al.)

**DECLARATION OF TAYJES SHAH, ESQ. IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

Under 28 U.S.C. § 1746, I, Tayjes Shah, hereby declare as follows:

1. I am an attorney at the law firm of The Miller Firm, LLC and one of the attorneys representing Dorothy Smith, Plaintiff, in this litigation. I submit this declaration in support of Plaintiff's Opposition to Defendants' Sixteenth Motion to Dismiss for Failure to Comply with Pretrial Order No. 14. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.
2. Attached as Exhibit A is a true and correct copies of the amended PFS submission submitted on 11/1/2018.
3. Attached as Exhibit B is a true and correct copies of amended PFS submission submitted on 8/10/2018.
4. Attached as Exhibit C is a true and correct copy of the original PFS submission submitted on 6/18/2018.

5. Attached as Exhibit D is correspondence sent to Defense on 10/18/2018 concerning the deficiencies.
6. Attached as Exhibit E is correspondence from Defense counsel on 10/23/2018 concerning the deficiencies.

Dated: 11/8/2018

Respectfully submitted,

s/Tayjes Shah

Tayjes Shah, Esq.
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CERTIFICATE OF SERVICE

This is to certify that on November 8, 2018 a copy of the foregoing document was served on all parties via the Court's electronic filing system.

Respectfully submitted,

s/Tayjes Shah

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